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Via ECF

March 30, 2022

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Sabby Volatility Warrant Master Fund Ltd., et al. v. Kiromic Biopharma, Inc., et al.* (SDNY
Case No. 1:22-cv-01927 (JGK)(SDA) – Request for Extension

Dear Judge Koeltl:

We represent Defendant Kiromic Biopharma, Inc. (“Kiromic” or the “Company”) in the above-referenced action, which was filed on March 7, 2022. Plaintiffs in this action allege claims against Kiromic and seven individual former or current officers and directors of the Company under Sections 11, 12(a)(2), and 15 of the Securities Act of 1933. The docket reflects that Kiromic’s time to respond to the complaint is March 30, 2022, based on Plaintiffs’ filing of affidavits of service that reflect purported service of process on all Defendants, including the individual Defendants (a number of whom do not reside in the United States), through the Company’s registered agent in Delaware. We are not aware of any proper basis to serve the individual Defendants through the registered agent in this action, nor are we aware of whether each of the individual Defendants have retained counsel. We have been conferring this week with counsel for Plaintiffs about an extension of the time by which to respond. However, Plaintiffs’ counsel has not responded to our recent outreach.

Accordingly, we respectfully request that Your Honor extend the time to answer, move, or otherwise respond to the complaint for at least 30 days.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Jay K. Musoff'.

Jay K. Musoff
Partner

cc: All Counsel of Record (via ECF)